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February 29, 2000

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Secretary
United States Surface Transportation Board
1925 K Street N. W.
Washington, D. C. 20243-0001

Re: Statement of E. Kenneth Bowers, Manager, Transportation & Logistics, ENAP, Inc., in opposition to the proposed merger of CN/IC and BNSF Railroads STB Ex Parte No. 582

Dear Secretary:

It's time to say NO!

Rail shippers and receivers throughout the United States are still reeling from the devastating effects of recent mergers within the rail industry. Now is not the time to sanction yet another merger. One that because of the nature of the rail industry will, in all likelihood, lead to further defensive consolidations and loss of all of the benefits of deregulation we fought for over the last two decades. One, which because of its ultimate outcome, may very well lead to total loss of competitive alternatives and the placing of enormous market power in the hands of two rail systems in North America.

My company, ENAP, Inc. is a member-owned cooperative buying group for lumber and building materials. Founded in 1967, we have grown to serve over 300 lumberyards stretching from Maine to Florida and the Midwest. We are heavy users of the rail systems of North America. Good rail service is essential to the forest products industry and to the ongoing operation of our network of distribution centers where carloads of lumber, plywood and building materials are unloaded and stored for ultimate delivery to our members. Many of our stockholders take direct rail carload delivery.

I am a forty-year veteran of the logistics business, having served three Fortune 100 companies in executive capacities following undergraduate and postgraduate studies in the distribution field. As a member and officer of many of the professional transportation organizations, I have been a scholarly advocate of meaningful changes in the regulation and structure of our United States transportation industry.

Prior to the June 1 split up of Consolidated Rail Corporation, we in the New England/Middle Atlantic rail users community were promised greater efficiencies, faster transit times, and most importantly, new competition for traffic routes. Instead we got

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confusion, chaos, misinformation, service that has yet to reach pre-merger levels and dramatically increased costs. These conditions persist to this day.

It's time to say NO! Instead, it's time to urge that the problems of the recent mergers be resolved. It's time to let last years' partners prove that they can deliver on their promises before any further rail industry combinations are considered.

Many of our members are so leery of the broken promises and the poor service they continue to receive that they are refusing to accept any more shipments via rail. They opt instead for more costly truck shipments that clog our highways, pollute our air and deplete our precious fuel oil reserves. ENAP, Inc. has filed a number of complaints with the STB regarding the service failures and the increased costs we have been forced to bear as a result of these ill-conceived combinations.

Today, with four major rail carriers in the United States and two more in Canada, shippers still retain some semblance of choice of rail routes. We fear the loss of such competitive choice if today's rail consolidation ultimately results in the creation of two giants. The scenario is easy to envision. Those not parties to the proposed merger will feel forced to seek other partners in order to survive and not be pushed aside.

We urge you to consider not only the short-term consequences of the proposed combination but the long- range end result.

It's time to say NO!

(Jem

E. Kenneth Bowers

Manager Transportation & Logistics

ENAP, Inc.

Sincerely,